

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

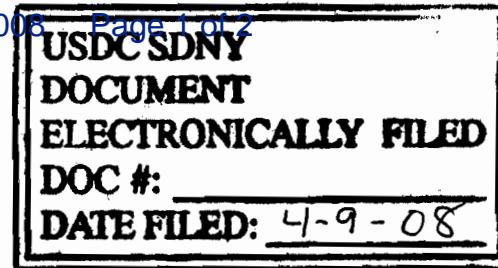
SUMMIT PROPERTIES INTERNATIONAL, L.L.C.,

Plaintiff,

v.

LADIES PROFESSIONAL GOLF ASSOCIATION,

Defendant.



07 Civ. 10407 (LBS)
ECF Case

JOINT PROPOSED DISCOVERY
PLAN

In accordance with Rule 26(f), the parties jointly propose to the Court the following discovery plan:

1. The parties shall exchange initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) by April 23, 2008.
2. No additional parties may be joined after July 30, 2008.
3. The parties shall be allowed to amend the pleadings until July 30, 2008.
4. Depositions:
 - a. Depositions are not to be held until all parties have responded to initial requests for document production. Plaintiff has served its initial request, and defendant's response is due by May 8, 2008. Defendant will serve its initial request by April 15, 2008.
 - b. There is no priority for depositions by reason of a party's status as plaintiff or defendant.
5. Fact discovery *including discovery of experts, if any* shall be completed by October 31, 2008.
6. Plaintiff shall identify any expert witnesses and serve any expert witnesses' reports relating to its claims, and defendant shall identify any expert witnesses and serve any

expert witnesses' reports relating to its counterclaims by December 9, 2008. Defendant shall identify any expert witnesses and serve any expert reports relating to the defense of plaintiff's claims, and plaintiff shall identify any expert witnesses and serve any expert reports relating to the defense of defendant's counterclaims by January 15, 2009.

7. The parties shall complete all expert depositions and expert discovery by February 15, 2009.

8. Any dispositive motions shall be filed by March 28, 2009.

9. The parties expect to be ready for trial by Feb 7, 2009, 2009. ~~or sixty days after a decision on any dispositive motions.~~ The Parties agree that a trial would take from 3 to 5 days.

Dated: April 9, 2008
New York, New York

KORNSTEIN VEISZ WEXLER &
POLLARD, LLP

DAVIS & GILBERT LLP

By: _____
Daniel J. Kornstein
Ina R. Bort
757 Third Avenue
New York, New York 10017
(212) 418-8600
dkornstein@kvwmail.com
ibort@kvwmail.com
Counsel for Plaintiff

By: _____
Howard J. Rubin
Scott M. Singer
1740 Broadway
New York, New York 10019
(212) 468-4800
hrubin@dglaw.com
ssinger@dglaw.com
Counsel for Defendant

SO ORDERED:

Jamie H. Gora
UNITED STATES DISTRICT JUDGE